

1 DANIEL G. BOGDEN
United States Attorney
2 RUSSELL MARSH
Assistant United States Attorney
3 AMBER M. CRAIG
Assistant United States Attorney
4 333 Las Vegas Blvd., South, Ste. 5000
Las Vegas, Nevada 89101
5 (702)388-6336 / Fax: (702)388-6698

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

-e0e-

UNITED STATES OF AMERICA)
vs)
KEYUNNA LATRESS JOHNSON,)
Defendant.)
Plaintiff,)
vs)
2:12-mj-00212-PAL

STIPULATION TO CONTINUE
PRELIMINARY HEARING
(Seventh Request)

15 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G.
16 Bogden, United States Attorney, and Russell Marsh and Amber Craig, Assistant United States
17 Attorneys, counsel for the United States of America, and Derrick Penney, Esq., counsel for
18 Defendant Keyunna Latress Johnson, that the Preliminary Hearing in this matter currently
19 scheduled for October 30, 2012, at the hour of 4:00 p.m., be vacated and set to a date and time to
20 be set by this court; however, no earlier than thirty (30) days.

21 This Stipulation is being entered into for the following reasons:

22 1. The Defendant signed a pre-indictment plea agreement which was sent to
23 the court clerk to have a district court criminal case number assigned and an arraignment and entry
24 of plea hearing set. One additional document (waiver of indictment) must be signed by the
25 Defendant before the criminal case can be opened. The parties respectfully request additional
26 time to allow defense counsel to meet with Defendant and have her sign the waiver.

1 2. The parties agree to the continuance.

2 3. The defendant is out of custody and does not object to the continuance.

3 4. The additional time requested herein is not sought for purposes of delay, but
4 merely to allow the parties sufficient time within which to finalize negotiations and to allow
5 defense counsel to become familiar with the discovery.

6 This is the seventh request to continue the preliminary hearing filed herein.

7 Dated this 29th day of October, 2012.

8 Respectfully Submitted,

9 **DANIEL G. BOGDEN**
10 United States Attorney

11 /s/ Russell Marsh

12 /s/ Derrick Penney

13 _____
14 RUSSELL MARSH
15 Assistant United States Attorney
16 AMBER M. CRAIG
17 Assistant United States Attorney

18 _____
19 DERRICK PENNEY, ESQ.
20 Counsel for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

-oOo-

UNITED STATES OF AMERICA)
Plaintiff,) 2:12-mj-00212-PAL
vs)
KEYUNNA LATRESS JOHNSON,) **ORDER**
Defendant.)

Based on the Stipulation of counsel and good cause appearing,
IT IS THEREFORE ORDERED that the Preliminary Hearing currently
scheduled on October 30, 2012, at the hour of 4:00 p.m., be vacated and continued to
_____ at the hour of ____:_____.m.

UNITED STATES MAGISTRATE JUDGE